## **DHEC Natural Gas Pipeline Permits**

**Dominion Carolina Gas Transmission** 

http://www.scdhec.gov/HomeAndEnvironment/Pollution/CleanUpPrograms/OngoingProjectsUpdates/Dominion/

## Kinder Morgan

http://www.scdhec.gov/HomeAndEnvironment/Pollution/CleanUpPrograms/OngoingProjectsUpdates/KinderMorgan/

## Natural Gas

- A XXX MW natural gas combined-cycle (NGCC) unit owned by an industrial facility (Columbia Energy) in South Carolina operated at less than a 1% capacity factor in 2012. As a result, the average capacity factor (45%) used by EPA for purposes of setting the state emissions reduction target over-estimates the ability of South Carolina utilities to increase the capacity factor at existing NGCC units currently on their system. The four NGCC units controlled by South Carolina utilities actually performed at an average capacity factor of 65% in 2012.
- o For purposes of compliance, how will EPA treat disruptions in the supply or availability of natural gas, e.g. natural gas curtailment?
- As opposed to factoring in natural gas units available at the time of the baseline, has the EPA accounted for overall natural gas supply, such as available pipeline infrastructure, time lags for when nationwide supply issues could be addressed, etc?
- How did EPA determine the available capacity factors of natural gas units in South Carolina? An appropriate rating of these natural gas units in determining a dependable average should be consistent with NERC reliability assessments, i.e. actual capacity vs. nameplate capacity.